

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

NATHAN LING,

PLAINTIFF,

VS

CIVIL ACTION NO: 3:20-CV-233

CAMPBELL COUNTY, TENNESSEE;
JUSTIN CRABTREE; DAKOTA WILLIAMS;
SEAN BROWN; JOSHUA MILLER, in their
individual and official capacities;
and JOHN DOES, names and identities
not yet known,

DEFENDANTS.

PRETRIAL DISCOVERY DEPOSITION OF:

DR. TODD ABEL

TAKEN ON AUGUST 17, 2023

* * * THIS STYLE PAGE IS CONTINUED * * *

Hicks Court Reporting • Sally Hicks • P.O. Box 8323, Gray, TN 37615 • 423-741-3366

1 Q. Okay.

2 A. And if he had stayed in the area, I
3 would've seen him back in clinic many times with CAT
4 scans.

5 Q. Okay. But in this particular situation,
6 it was a week?

7 A. Roughly. And I can find the exact
8 dates. It's in the progress notes. There's a
9 progress note where we say we're signing off at this
10 point, but we're available for further care.

11 Q. Let me ask you this. Doctor, you had
12 not seen Mr. Ling prior to June 2nd of 2019, correct?

13 A. Correct.

14 Q. And as you noted under questioning by
15 Mr. Seaton, a lot of these systems could have
16 predated this incident?

17 A. Yes.

18 Q. And you're not telling the jury what the
19 actual cause of his injuries to his head were, are
20 you?

21 A. I don't understand.

22 Q. I mean, you didn't investigate this
23 situation?

24 A. I didn't personally see the blows to the
25 head, if that's what you mean.

1 Q. Okay. Let me ask you. Could this type
2 of, these types of injuries to the head be caused by
3 other traumas?

4 A. Yeah, certainly.

5 Q. Okay. Like, if someone ran into a
6 pickup truck and hit their head and was rendered
7 unconscious, could that be a trauma that could lead
8 to a traumatic brain injury?

9 A. I mean, you can hypothetically come up
10 with any, any trauma.

11 Q. Okay.

12 A. If he did get hit by a pickup truck, I'd
13 have to have more details, whether that caused or
14 not. If you're going to give me more details I can
15 render an opinion if the pickup, the alleged pickup
16 truck accident was significant or not.

17 Q. Well, I guess what I'm getting at is, it
18 could be any trauma, whether it be a fall or an
19 accident or...?

20 A. Obviously that's, you know, a fall off a
21 50 foot ladder would cause it.

22 Q. Okay. And like you said, you've been in
23 Iraq and obviously seen severe brain injuries...?

24 A. Right.

25 Q. ...from military personnel, correct?